

United States District Court  
Southern District of Ohio  
Western Division.

2005 SEP 19 PM 2:13

United States of America  
Plaintiff

- vs -

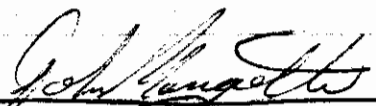
JOVANNI F. MANGOTTI  
Defendant (Pro-se)  
(AKA JOHN. DUNCAN.)

: CASE NO CR-1-02-100(C)  
: Judge Walter Rice [CJ]  
:  
: Defendants Motion for Conference  
: with the Courts, and Report Date.  
: {ORAL HEARING REQUESTED}

Now comes defendant By and through pro-se who respectfully moves this Honorable Court to allow the Defendant to confer with the Courts on several issues that the Defendant asserts is detrimental in the sentencing phase of both the Defendant and his Co-defendant, Defendant also asserts that he has made several attempts to contact his attorney prior to the filing of this Request but has not been able to reach him.

With the brief and Memorandum in support enclosed herein this Motion should further support naught.

Respectfully Submitted

  
JOVANNI F. MANGOTTI  
(AKA JOHN F. DUNCAN)  
MCEF - USMS  
2042 No. Co. Rd. 25-A.  
TROY OHIO 45373

Brief and Memorandum In Support.

Defendant moves and asserts that there is a necessity to be allowed to address the Court directly on several issues that have arisen since last Court appearance on June 14, 2005.

Defendant, Mr. Mangotti, (herein after referred to as defendant) was informed immediately after last Court date appearance by Michelle Mangotti's (herein after referred to as co-defendant) ex-husband one TONY L. BLANKENSHIP, of co-defendants abandonment, neglect and absence of ~~both~~ her children and her home; Mr. Blankenship contended that co-defendant had, upon her own accord decide to leave the home and children to live with her brother Daniel Paternale, as well as several other known criminals in and around a known drug house. Mr. Blankenship as well as several other members of co-defendants family have consistently reported perpetual drug use by co-defendant, neglect of person and children, several have contacted the U.S. probation Dept. regarding such matters only to be ignored.

It has come to the attention of Defendant that co-defendant has been a part of several criminal conspiracy ventures involving friends and family members, as well as conduct bordering upon lack of discern for her family and children.

Whereas co-defendant had help harbor fugitives, aided and abetted in drug distribution, aided and abetted in the possible credit card fraud, U.S. Postal fraud, as well as wire fraud, continually over the last 2 years, when confronted by the defendant on these issues the co-defendant would then call both her attorney and pre-trial officer Mr. Todd Morris, <sup>and</sup> claim that the defendant was trying to "make up accusations" to get the co-defendant into trouble, usually by claiming that the defendant was upset by the co-defendants boyfriend, Mr. Brett Kandle, who is also an indicted co-conspirator and well as an alleged victim; though this is false, the defendant asserts that the co-defendant has knowingly and wittingly manipulated the defendant, her attorney, and the U.S. government, the courts as well as her pre-trial officer, and has gone out

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of her way to make it appear that the defendant has lead, manipulated or coerced the co-defendant, therefore this request for conference with the Court to address several issues including the subpoena of records, documents and witnesses to the effect of the defendant's character assassination by the co-defendant and her attorney Mr. Richard Mannheim.

Co-defendant was confronted with the fact that the defendant had written letter to the U.S. Probation Dept. regarding her current behavior and neglect and the co-defendant had advised the defendant that she had directed her attorney to lodge a complaint against the defendant asserting false accusations which has lead the defendant to make the request for conference to assert his claim to the following facts

- ① Co-defendant has abandoned and neglected the children that she has asserted to her need for downward departure, she has not lived in the home with them since before the June 16<sup>th</sup> 2005 Court Date.
- ② Co-defendant has been using all types of drugs to include, Meth, crack, cocaine, Marijuana, among others, and has admitted such, telephonically to the defendant, as well as how she can pass the "tests".
- ③ Co-defendant Resided in a home with her brother Daniel Paternande, for which a Homosexual had transpired and for which her indirect knowledge had prevented the capture of the Murderer.
- ④ Co-defendant had fled the residence of the Homosexual and relocated with Mrs. Miranda Stumper, [Co-defendant] Co-defendant was asked several times by her patrol officer as well as her attorney if she had in fact been residing in said Residence; she denied this (Proof, of Telephonically recorded conversations available)
- ⑤ Co-defendant has participated with Brothers David Paternande and Daniel Paternande as well as Miranda Stumper in numerous criminal activities to include but not limited to credit card fraud, wire fraud, Drug Trafficking, Postal Fraud, as well as others all of which has at relevant times been telephonically recorded.




- ⑥ Defendant as well as other family members of co-defendant has made contact with U.S. probation dept., as well as U.S. Attorneys office and presumably all claims have gone ignored.


Defendant feels that through the course of all these proceedings he has been made out to be a villain, or a leader, or manipulator of sorts, the co-defendants, unindicted or otherwise are continuing to carry out the same or similar schemes or acts without the aid or benefit by the defendant.

The Defendant Moves that this Request is in no way a vindictive one which will undoubtedly be asserted by the co-defendant's Counsel, therefore the defendant requests a <sup>conference</sup> ~~conference~~ with the Courts to assent, sustain, and prove these claims.

Respectfully Submitted.

  
 GIOVANNI F. MANGOTTI  
 (AKA JOHN F. DUNCAN)  
 2042 N. COUNTY Rd. 25-A.  
 Troy Ohio 45373

I Herby certify a true foregoing copy of this Motion was sent via U.S. Mail to the Asst. U.S. Attorney Mr. AMUL Thapar, and to co-defendants Counsel Mr. Richard Monahan U.S. Public defender office on this day of September 2005

  
 GIOVANNI F. MANGOTTI  
 (AKA, JOHN F. DUNCAN)